

MARQUIS AURBACH COFFING

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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

Nicholas Hansen,

Plaintiff,

vs.

Officer Theodor “Teddy” Schaefer #9087,  
Officer Darrel Davies #14917, Sheriff Joe  
Lombardo, The Cromwell Las Vegas, Caesars  
Entertainment Corporation, Clark County,  
Clark County District Attorney Steven  
Wolfson, Ass. District Attorney Samuel Kern,  
DOES I through X, and/or ROE  
CORPORATIONS I through X,

Defendants.

Case Number: 2:19-cv-02234-APG-BNW

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY PLAN AND  
SCHEDULING ORDER DEADLINES  
(FIRST REQUEST)**

Plaintiff Nicholas Hansen (“Plaintiff”), by and through their attorneys of record, Joel F. Hansen, Esq. and Jonathan J. Hansen, Esq., with the law firm of Hansen & Hansen, LLC, Defendants Sheriff Joseph Lombardo (“Lombardo”), Officer Theodor “Teddy” Schaefer #9087 (“Schaefer”), and Officer Darrel Davies #14917 (“Davies”), (hereinafter “LVMPD Defendants”), by and through their attorneys of record, Craig R. Anderson, Esq. and Jackie V. Nichols, Esq., with the law firm of Marquis Aurbach Coffing; and Defendants Corner Investment Company, LLC and Caesars Entertainment Corporation (“Defendants”), by and through their attorney of record, Richard Dreitzer, Esq., with the law firm of Fennemore Craig (collectively “the Parties”), hereby stipulate and agree to extend the Discovery Plan

1 and Scheduling Order deadlines an additional forty-five (45) days. This Stipulation is being  
2 entered in good faith and not for purposes of delay.

3 **I. STATUS OF DISCOVERY.**

4 **A. PLAINTIFF'S DISCOVERY.**

5 1. Plaintiff's Initial Disclosure of Witnesses and Documents Pursuant to FRCP  
6 26.1(a)(1) dated November 4, 2020;

7 **B. DEFENDANTS' DISCOVERY.**

8 1. LVMPD Defendants' Initial Disclosure of Witnesses and Documents  
9 Pursuant to FRCP 26.1(a)(1) dated November 2, 2020;

10 2. Officer Theodor Schaefer's First Set of Interrogatories to Plaintiff Nicholas  
11 Hansen dated February 19, 2021;

12 3. Officer Darrel Davies' First Set of Interrogatories to Plaintiff Nicholas  
13 Hansen dated February 19, 2021;

14 4. LVMPD Defendants' First Supplemental Disclosure of Witnesses and  
15 Documents Pursuant to FRCP 26.1(a)(1) dated February 19, 2021;

16 5. Sheriff Joe Lombardo's First Set of Interrogatories to Plaintiff Nicholas  
17 Hansen dated March 1, 2021;

18 6. Sheriff Joe Lombardo's First Set of Requests for Production of Documents to  
19 Plaintiff Nicholas Hansen dated March 1, 2021; and

20 7. Sheriff Joe Lombardo's First Set of Requests for Production of Documents to  
21 Defendant Caesars Entertainment dated March 2, 2021.

22 **II. DISCOVERY THAT REMAINS TO BE COMPLETED.**

23 The Parties are actively conducting discovery. For the reasons explained below, the  
24 Parties will need additional time to conduct depositions based on LVMPD's counsel's  
25 schedule.  
26  
27

**III. SPECIFIC DESCRIPTION OF WHY EXTENSION IS NECESSARY.**

Counsel for LVMPD has an extensive caseload and does not have available dates in March to conduct depositions. Furthermore, counsel for LVMPD has a firm trial setting in April in a civil case in the Eighth Judicial District Court, Clark County, Nevada. As such, a 45-day extension is necessary to accommodate counsel's schedule so that the parties may conduct depositions.

**IV. PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING DEADLINES**

	<b>Current Deadline</b>	<b>Proposed New Deadline</b>
Amend Pleadings and Add Parties	January 8, 2021	<b>None</b>
Initial Expert Disclosures	February 8, 2021	<b>None</b>
Rebuttal Expert Disclosures	March 10, 2021	<b>None</b>
Discovery Cut-Off	April 9, 2021	<b>May 24, 2021</b>
Dispositive Motions	May 10, 2021	<b>June 24, 2021</b>
Pretrial Order	June 9, 2021	<b>July 23, 2021</b>

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1 Based on the foregoing stipulation and proposed deadlines plan, the Parties request  
2 that the Discovery Plan and Scheduling Order deadlines be extended an additional forty-five  
3 (45) days so that the parties may conduct depositions.

4 Dated this 5th day of March, 2021.

Dated this 5th day of March, 2021.

5 HANSEN & HANSEN, LLC

MARQUIS AURBACH COFFING

6  
7 By: /s/ Joel F. Hansen

Joel F. Hansen, Esq.

Nevada Bar No. 1876

Jonathan J. Hansen, Esq.

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By: /s/ Jackie V. Nichols

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Attorneys for LVMPD Defendants

11 Dated this 5th day of March, 2021.

12 FENNEMORE CRAIG

13  
14 By: /s/ Richard Dreitzer

Richard Dreitzer, Esq.

Nevada Bar No. 6626

300 S. Fourth Street, Suite 1400

Las Vegas, Nevada 89101

Attorneys for Defendants Corner

Investment Company, LLC and Caesars

Entertainment Corporation

19 **ORDER**

20 **IT IS SO ORDERED**

21 **DATED:** 11:02 am, March 09, 2021

22 

23 **BRENDA WEKSLER**

24 **UNITED STATES MAGISTRATE JUDGE**